

EXHIBIT A

FREEDMAN AND LORRY, P.C.
SCOTT A. PORTNER, ESQUIRE

Identification No. 85314
1601 Market Street, Suite 1550
Philadelphia, PA 19103
Phone: (215) 925-8400

Attorney for Plaintiff

DANIELLE ROGERS
1700 Warwick Avenue
Folcroft, PA 19032

Plaintiff

COURT OF COMMON PLEAS
DELAWARE COUNTY

NO. CV-2021-003714

v.

DOLLAR GENERAL STORE #14849
704 Garrett Rd
Upper Darby, PA 19082, and

DOLLAR GENERAL CORPORATION
100 Mission RDG
Goodlettsville, TN 37022

Defendants

AMENDED COMPLAINT- CIVIL ACTION
PREMISES LIABILITY – SLIP AND FALL 2S
NOTICE TO PLEAD

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by an attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE
FRONT AND LEMON STREETS
MEDIA, PA 19063
610-566-662

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Attorney for Plaintiff

DANIELLE ROGERS	:	COURT OF COMMON PLEAS
1700 Warwick Avenue	:	DELAWARE COUNTY
Folcroft, PA 19032	:	
Plaintiff	:	NO. CV-2021-003714
v.	:	
	:	
DOLLAR GENERAL STORE #14849	:	
704 Garrett Rd	:	
Upper Darby, PA 19082, and	:	
	:	
DOLLAR GENERAL CORPORATION	:	
100 Mission Rdg	:	
Goodlettsville, TN 37072	:	
Defendant	:	

AMENDED COMPLAINT- CIVIL ACTION
PREMISES LIABILITY – SLIP AND FALL 2S

Plaintiff, Danielle Rogers, by and through her undersigned attorney, claims of Defendants, and/or their agents, servants, workmen and/or employees a sum in excess of Fifty Thousand Dollars (\$50,000.00) in damages based upon a cause of action, and in support thereof avers as follows:

1. Plaintiff Danielle Rogers is an adult individual who at all times relevant hereto resides at 1700 Warwick Avenue, Folcroft, Pennsylvania, 19032.
2. Defendant, Dollar General Store No. 14849, is a business entity registered to do business in the State of Pennsylvania, with its principal place of business located at 704 Garrett Road, Upper Darby, PA 19082.

3. Defendant, Dollar General Corporation, is Tennessee Corporation registered to do business in the state of Pennsylvania, with its principal place of business located at 100 Mission Rdg Goodlettsville, TN 37072.

4. At all times material hereto, all Defendants individually and/or jointly by and/or through their agents, servants, workmen and/or employees, owned, leased, operated, maintained, and controlled the premises at 704 Garret Road, Upper Darby, Pennsylvania, (hereinafter, the "Premises").

5. At all times relevant hereto, Defendants, individually and/or jointly by and/or through their agents, servants, workmen and/or employees, were responsible for the inspection and maintenance of the Premises and to ensure same were free of obstacles, defects, and dangerous conditions to allow for the safe passage of the Plaintiff and other pedestrians lawfully proceeding thereon.

6. At all times material hereto, Defendants were responsible for the inspection, maintenance, and/or repair of defects and dangerous conditions at the Store.

7. At all times material hereto, Plaintiff was a business invitee of Defendant(s) at the above-referenced Store.

8. On or about May 5, 2019, at approximately 10:00 a.m., Plaintiff was entering the Store located at 704 Garrett Road, in Upper Darby, Delaware County, Pennsylvania, when she slipped and fell on a wet substance present on the floor.

9. The Defendant, their agents, assigns, employees, and/or servants knew, or in the exercise of reasonable care should have known of the dangerous condition of the wet, slippery substance on the floor of the Store and should have prevented, remedied and/or warned of the condition on the Premises.

COUNT ONE – NEGLIGENCE

DANIELLE ROGERS V. DOLLAR GENERAL & DOLLAR GENERAL CORPORATION

10. Plaintiff repeats and incorporates the aforesaid paragraphs as though fully set forth herein.

11. Defendants, by and through their agents, servants, workmen and/or employees were careless and negligent in the following manner:

- a. Failing to properly and adequately inspect said Store for defects and/or dangerous conditions;
- b. Failing to properly and adequately maintain said Store in a safe manner;
- c. Permitting and allowing the Store to be unsafe due to a greasy and/or slippery floor in an area where invitees may slip and fall, thereby creating a dangerous condition;
- d. Failing to properly and adequately warn Plaintiff of the dangerous conditions then and there existing;
- e. Failing to warn of a greasy and/or slippery floor in an area where it was not open and obvious to Plaintiff, and/or Plaintiff had no safer alternative pathway;
- f. Failing to properly and adequately maintain said Store in accordance with local ordinances and the laws of the State of Pennsylvania;
- g. Failing to make reasonable inspections and to observe the aforesaid unsafe condition;
- h. Failing to use due care for the safety of the Plaintiff under the circumstances;
- i. Allowing the floor to remain slippery for an unreasonably long period of time;
- j. Failing to properly train employees, agents, and servants to inspect for dangerous conditions, and to make said area reasonably safe for invitees;

- k. Failing to properly supervise and/or hire competent individuals trained to remedy the slippery floor and make said area reasonably safe for invitees;
- l. Failing to request the services of/contractors and/or employees, agents, and servants, in a reasonable time to remedy the slippery floor and make said area reasonably safe for invitees.

12. By reason of the carelessness and negligence of the Defendants, and/or their agents, servants, workmen and/or employees as aforesaid, Plaintiff was caused to slip and fall and sustain serious injuries, including *inter alia*: disc protrusion at L5-S1; disc bulge at L4-5; right L5 radiculopathy; lumbar spine sprain and strain; cervical spine sprain and strain; right shoulder pain; posttraumatic chondromalacia of the patella of her right knee; and headaches.

13. As a further result of the carelessness and negligence of the Defendants, and/or their agents, servants, workmen and/or employees as aforesaid, Plaintiff has in the past required and may in the future continue to require medicines, medical care, and attention; and she has in the past been and may in the future be compelled to expend monies and incur obligations for such care and attention.

14. As a further result of the carelessness and negligence of the Defendants, and/or their agents, servants, workmen and/or employees as aforesaid, Plaintiff has in the past suffered and may in the future continue to suffer agonizing aches, pains, and mental anguish; and she has in the past been and may in the future continue to be disabled from performing her usual duties, occupations and avocations and suffered/suffers wage loss as a result.

15. As further result of the carelessness and negligence of the Defendants, and/or their agents, servants, workmen and/or employees, Plaintiff has incurred and will continue to incur wage loss and loss of earning potential.

16. As a result of the carelessness and negligence of Defendants, and/or their agents, servants, workmen and/or employees, Plaintiff incurred medical expenses, will continue to incur medical expenses, and has additionally incurred other outstanding bills and liens related to the accident which are recoverable as damages.

WHEREFORE, Plaintiff demands judgment against the Defendants for damages and costs of suit, and any other compensation the Court deems just.

FREEDMAN & LORRY, P.C.

By: /s/ Scott A. Portner
SCOTT A. PORTNER, ESQUIRE
Attorney for Plaintiff

Date: 4/21/21

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW
ARBITRATION NOTICE

Danielle Rogers,
Plaintiff
v.
Dollar General,
Defendant.
No. CV-2021-003714

This is to notify you that an Arbitration is
scheduled for:

01-18-2022

9:30 AM

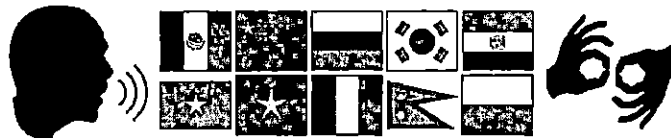
ATTENTION

Please report to the Arbitration Assembly Room, Delaware County Courthouse, Media, Pennsylvania. No further notice of the trial date will be given.

This matter will be heard by a Board of Arbitrators at the time, date, and place specified above but if one or more of the parties is not present at the hearing, the matter may be heard at the same time and date before a Judge of the Court without the absent party or parties. There is no right to a trial de novo or appeal from a decision entered by a Judge.

All pretrial motions with the exception of continuance applications must be filed thirty (30) days prior to the hearing date under Delaware County Local Rule 1303 (f).

Notice of Language Rights



Language Access Coordinator

Delaware County Courthouse, 201 West Front Street, Media, PA, 19063

610-891-4633

LanguageAccessCoordinator@co.delaware.pa.us

English: You have the right to an interpreter at no cost to you. To request an interpreter, please inform court staff using the contact information provided at the top of this notice.

Spanish/Español: Usted tiene derecho a un intérprete libre de costo. Para solicitar un intérprete favor de informárselo al personal judicial utilizando la información provista en la parte superior de este aviso.

Vietnamese/Tiếng Việt: Quý vị có quyền được một thông dịch viên giúp mà không tốn chi phí nào cả, xin hãy báo cho nhân viên tòa án dùng thông tin liên lạc có ở trên đầu thông báo này.

French/Français : Vous avez le droit de bénéficier gratuitement de l'assistance d'un interprète. Pour en faire la demande, veuillez en informer le personnel du tribunal à l'aide des coordonnées indiquées en haut de page.

Punjabi/ ਪੰਜਾਬੀ /India: ਤੁਹਾਨੂੰ ਇੱਕ ਦੁਭਾਸ਼ੀਆ ਹਾਸਲ ਕਰਨ ਦਾ ਹੱਕ ਹੈ, ਜਿਸ ਦੀ ਤੁਹਾਨੂੰ ਕੋਈ ਲਾਗਤ ਨਹੀਂ ਲੱਗੇਗੀ। ਦੁਭਾਸ਼ੀਏ ਲਈ ਬੇਨਤੀ ਕਰਨ ਵਾਸਤੇ, ਕਰਿਯਾ ਕਰ ਕੇ ਅਦਾਲਤ ਦੇ ਅਮਲੇ ਨੂੰ ਜਾਣੂ ਕਰਵਾਓ ਤੇ ਇਸ ਲਈ ਇਸ ਨੋਟਿਸ ਦੇ ਸਖਿਰ ਉਤੇ ਦੱਤੀ ਸੰਪਰਕ ਜਾਣਕਾਰੀ ਦਾ ਇਸਤੇਮਾਲ ਕਰੋ।

IN THE COURT OF COMMON PLEAS OF DELAWARE COUNTY, PENNSYLVANIA
CIVIL ACTION – LAW
ARBITRATION NOTICE

Bengali / □□□□□: আপনার বিনামূল্যে একজন দো ভাষী পাবার অধিকার আছে। একজন দো ভাষী পাবার জন্য এই বজিৎপত্রি ওপর দওয়া য়ে গায়ে গ ববিরণী ব্যবহার করে আদালতরে কর্মচারীদরে সঙ্গে য়ে গায়ে গ করুন।